

EXHIBIT 20

James Justin Lyles
Provence, Tiffany N v. United States of America, et al

December 14, 2021

Page 1

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF SOUTH CAROLINA
3 CHARLESTON DIVISION
4 IN ADMIRALTY

5 TIFFANY N. PROVENCE, AS THE PERSONAL
6 REPRESENTATIVE OF THE ESTATE OF JUAN
7 ANTONIO VILLALOBOS HERNANDEZ,

Plaintiff,

8 vs. CASE NO. 2:21-cv-965-RMG

9 UNITED STATES OF AMERICA, CROWLEY
10 MARITIME CORPORATION, CROWLEY GOVERNMENT
11 SERVICES, INC., DETYENS SHIPYARDS, INC.,
12 AND HIGHTRAK STAFFING, INC. D/B/A HITRAK
13 STAFFING, INC.,

Defendants.

14 DEPOSITION OF: JAMES JUSTIN LYLES
15 DATE: December 14, 2021
16 TIME: 9:08 a.m.
17 LOCATION: DETYENS SHIPYARDS, INC.
18 1670 Dry Dock Avenue
19 Suite 200
20 North Charleston, SC

TAKEN BY: Counsel for the Plaintiff

21 REPORTED BY: MICHAEL DAVID ROBERTS,
22 Court Reporter
23
24
25

1 it was a couple years ago.

2 Q. Right. Do you remember you actually
3 met with the chief mate even if you don't recall
4 the details of it?

5 A. Yes, sir.

6 Q. So on the Lummus when you would do your
7 safety walks, you would meet with the chief mate?

8 A. Get with somebody from the ship's crew
9 to see if they have any issues. That's the first
10 thing you do when you get on board.

11 Q. Okay. Every time you get on board, the
12 first thing you do is communicate with somebody
13 from the ship's crew. Is that accurate?

14 A. If -- if they're available.

15 MR. CLEMENT: Objection to the form.

16 You can answer.

17 THE WITNESS: If they're available.

18 BY MR. YOUNG:

19 Q. Okay. Right. All right. So assuming
20 that they're available, every time you step on a
21 ship, the first thing you do is communicate
22 directly with some of the ship's crew; is that
23 right?

24 A. Yes, sir.

25 Q. And the purpose of that is to find out